

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE;  
MISSISSIPPI STATE CONFERENCE OF  
THE NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE;  
JACKSON CITY BRANCH OF THE  
NAACP; DERRICK JOHNSON; FRANK  
FIGGERS; CHARLES TAYLOR;  
MARKYEL PITTMAN; CHARLES JONES;  
and NSOMBI LAMBRIGHT-HAYNES,

*Plaintiffs,*

v.

TATE REEVES, in his official capacity  
as Governor of the State of Mississippi;  
SEAN TINDELL, in his official capacity  
as Commissioner of Public Safety; BO  
LUCKEY, in his official capacity as  
Chief of the Mississippi Department of  
Public Safety Office of Capitol Police;  
MICHAEL K. RANDOLPH, in his  
official capacity as Chief Justice of the  
Mississippi Supreme Court; and LYNN  
FITCH, in her official capacity as  
Attorney General of the State of  
Mississippi,

*Defendants.*

**Civil Action No. 3:23-cv-272-HTW-LGI**

**PLAINTIFFS IN *JXN UNDIVIDED COALITION* v. *TINDELL*  
MOTION FOR CONSOLIDATION**

Pursuant to Federal Rule of Civil Procedure 42(a), Plaintiffs in Civil Action No. 3:23-cv-351-TSL-RPM, *Jxn Undivided Coalition, et al. v. Tindell, et al.*, hereby move for consolidation of their case, filed last week in this Court, with this action. As set forth more fully in the accompanying memorandum, consolidation is appropriate because: (1) the actions are pending in the same judicial district; (2) common parties are involved; (3) there are common questions of law or fact; (4) if the cases are tried separately, a risk of inconsistent adjudications of factual and legal issues would exist; (5) consolidation will conserve judicial resources; (6) consolidation will not result in an unfair advantage; (7) consolidation will reduce the time for resolving the cases; and (8) consolidation will reduce the cost of trying the cases separately.

Based on the foregoing; the exhibits attached to this motion, listed below; and the reasons set forth in Plaintiffs' accompanying memorandum of authorities, Plaintiffs respectfully submit that this action and Civil Action No. 3:23-cv-351-TSL-RPM should be consolidated for all purposes pursuant to Federal Rule 42(a) and Local Rule 42.

**Exhibit A:** Civil Cover Sheet in *Jxn Undivided Coalition v. Tindell*

**Exhibit B:** Complaint in *Jxn Undivided Coalition v. Tindell*

Submitted, this 7th day of June, 2023.

/s/ Paloma Wu

Paloma Wu (Miss. Bar No. 105464)  
MISSISSIPPI CENTER FOR JUSTICE  
210 E. Capitol Street, Ste 1800  
Jackson, MS 39201  
(601) 709-0858  
pwu@mscenterforjustice.org

Cliff Johnson (Miss. Bar No. 9383)  
MACARTHUR JUSTICE CENTER  
University of Mississippi School of Law  
481 Chucky Mullins Drive  
University, MS 38677  
(662) 915-6863  
cliff.johnson@macarthurjustice.org

*Attorneys for Plaintiffs*